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TELECOPIER NUMBER  
202-828-4130

March 17, 1997

**BY HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: 

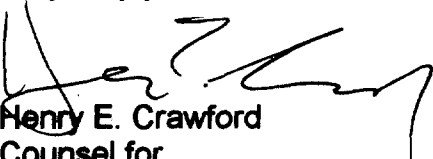
Amendment of Section 73.202(b) Table of Allotments, FM Broadcast Stations Twin Falls, Idaho
MM Docket No. 97-28, RM-8917

Dear Mr. Caton:

Transmitted herewith on behalf of Orchalara Broadcasting Company are an original and four (4) copies of its "Comments of Orchalara Broadcasting Company" as directed to the Chief, Allocations Branch.

Should any additional information be required, please contact this office.

Very truly yours,

  
Henry E. Crawford  
Counsel for  
Orchalara Broadcasting Company

cc: John A. Karousos  
Ms. Nancy Joyner

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Before the  
**Federal Communications Commission**  
 Washington, D.C. 20554

RECEIVED

MAR 21 1997

In the Matter of	) MM Docket No. _____
	) RM- _____
Amendment of Section 73.202(b)	)
(Table of Allotments)	)
FM Broadcast Stations	)
	)
Tishomingo, Tuttle, Woodward,	)
and Alva, Oklahoma	)

To: Chief, Mass Media Bureau  
 Policy and Rules Division  
 Allocations Branch

**PETITION FOR RULE MAKING**  
**AND REQUEST FOR ISSUANCE OF ORDER TO SHOW CAUSE**

Ralph Tyler ("Mr. Tyler"), permittee of KTSH(FM), Tishomingo, Oklahoma<sup>1</sup>, by his attorneys, and pursuant to Section 1.420(i) of the Commission's Rules, hereby respectfully requests the Commission to amend Section 73.202(b) of the Rules to (a) delete Channel 259C3 from Tishomingo, Oklahoma, (b) add Channel 259C3 to Tuttle, Oklahoma; (c) modify the license for KTSH(FM), Tishomingo, Oklahoma, to specify "Tuttle, Oklahoma" as the Station's city of license, (d) modify the license of KWFX(FM), Channel 260C1, Woodward, Oklahoma, to operate on Channel 292C1; and (e) modify the license of KXLS(FM),

---

<sup>1</sup>KTSH is operating pursuant to program test authority (See File No. BLH-960820KA).

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Channel 259C1, Alva, Oklahoma, to operate on Channel 260C1. In support whereof, the following is shown:

### **Background**

1. KTSH operates on Channel 259C3 at Tishomingo, Oklahoma. Mr. Tyler requests the Commission to delete Channel 259C3 from Tishomingo and to reallocate it to Tuttle, Oklahoma, with a concurrent modification of the license of KTSH to operate on Channel 259C3 at Tuttle, Oklahoma. Such a change is permissible under Section 1.420(i) of the Rules, which authorizes the Commission to modify the license or permit of an FM station to specify a new community of license where the amended allotment would be mutually exclusive with the licensee's present allotment.

2. Two factors must be demonstrated in order to change a station's city of license in a rule making proceeding: (1) the channel changes must be mutually exclusive, and (2) the rule making must not deprive a community of an existing service representing its only local transmission service. The Commission stated that in making the determination of whether to amend the Table of Assignments it would "take into account the totality of the service improvements resulting from a proposed change in community of license in determining whether an allotment proposal should be approved." *See Modification of FM and TV Authorizations (New Community of License)*, 4 FCC Rcd 4870 [66 RR 2d 877] (1989). It is believed that Mr. Tyler's proposal is consistent with the rules and Commission policies, i.e., the proposed allotment is short-spaced to the present KTSH site, and a pending

application (File No. BPH-970220IA) to move the KTSH transmitter. The rule making will not deprive Tishomingo of its only local transmission service, since an application (File No. BPED-970127MD) is pending that seeks a construction permit for a new noncommercial educational FM station at Tishomingo.

### **Expression of Continuing Interest**

3. If the Commission allots Channel 259C3 to Tuttle, promptly after the effective date of the allotment, Mr. Tyler will file an application for a minor change construction permit to operate KTSH at Tuttle, and upon grant, Mr. Tyler will promptly construct and operate the facilities.

4. Attachment A is a Technical Exhibit, which is incorporated herein by reference, that provides the Commission with technical information about the proposed Tishomingo/Tuttle channel exchange.

### **Tishomingo, Oklahoma**

5. As stated in the Technical Exhibit, Tishomingo had a 1990 population of 3,116 persons. Tishomingo has one commercial broadcast station (KTSH) and a pending application for a new noncommercial FM station. A "Gain/Loss Study" is submitted as Exhibit #4 of the Technical Exhibit. In addition to showing that there would be a net gain of 731,219 in population served, the "Gain/Loss Study" indicates that there are at least five stations that provide service to the current KTSH service area. Thus, Tishomingo will continued to be well-served by broadcast media.

## Tuttle, Oklahoma

6. According to information gathered by Mr. Tyler, Tuttle is an incorporated city with a mayor, city manager and city council. It had a 1990 population of 2,807. There is a comprehensive city plan and zoning. Tuttle maintains a municipal court, police department, volunteer fire department with a full-time fire chief, a fleet of vehicles, a parks board, planning commission, board of adjustment, and city attorney. There are two city parks. The Tuttle Public Works Authority provides gas, water, sewer and garbage services. Tuttle has its own post office and ZIP code. Tuttle has four primary and secondary schools with approximately 1,200 students and 86 teachers. In Tuttle there are two banks, a nursing home, an osteopath, a chiropractor and two dentists. Tuttle has 21 Protestant churches and one Catholic church. Tuttle has one weekly newspaper, the Tuttle Times. Tuttle has commercial businesses and industry, including Braum's Dairy and Delta Faucet (See copy of Southwestern Bell Yellow Pages, Attachment B). Therefore, Tuttle possess the requisite "social, economic and cultural components that are commonly associated with community status." *See, FM Table of Allotments (East Hemet, CA)*, 67 RR 2d 146, 147 (1989). Tuttle has no broadcast stations assigned to it, so KTSH would bring first local service to Tuttle. Tuttle is not located in an Urbanized Area. From the reference site, only 23% of the Oklahoma City Urbanized Area would receive a 70 dBu or greater signal. Therefore, since less than 50% of the Urbanized Area is covered by the predicted 70 dBu signal, it is not necessary to provide additional information to determine

whether Tuttle warrants a first local service preference. See *Headland, Alabama, and Chattahoochie, Florida*, 10 FCC Rcd 10342 (1995).

There is great local public interest in allotting Channel 259C3 to Tuttle. Attached hereto (Attachment C) are letters supporting the proposal from the Tuttle City Manager, the Mayor, the Chief of Police, the president of the Tuttle Area Chamber of Commerce, and other local residents.

### **Public Interest Considerations**

7. In changing its city of license, KTSH proposes to relocate its transmitter site. The Technical Exhibit demonstrates that the area gained by the proposal will be 267 square kilometers. The current facilities serve 36,134 persons. The new facilities will serve 767,353 persons, a net gain of 731,219 persons. The Technical Exhibit demonstrates that the entire loss area will be covered by at least five primary aural services and is, therefore, well-served. See, *FM Table of Allotments (Douglas, GA, et al.)*, 10 FCC Rcd 7706, 7707 (1995). Since Tishomingo will continue to receive local service from a new noncommercial FM station, Mr. Tyler's proposal will not deprive Tishomingo of its only local transmission service.

8. As shown in the attached Technical Exhibit, Tuttle would be entirely covered by a 70 dBu or better signal from KTSH. Thus, modification of the license for KTSH would be consistent with the Commission's city-grade contour coverage requirements.

### **Substitution of Channels at Woodward and Alva, Oklahoma**

9. Channel 259C3 can be allotted to Tuttle, Oklahoma, at a reference point located at **North latitude 35° 17' 33"**, **West longitude 97° 42' 58"** in compliance with all spacing constraints if Channel 292C1 is substituted for Channel 261C1 at Woodward, Oklahoma, and the license of KWFX(FM), Woodward, is modified to operate on Channel 292C1; and if Channel 260C1 is substituted for Channel 259C1 at Alva, Oklahoma, and the license of KXLS(FM), Alva, is modified to operate on Channel 260C1. KWFX can utilize Channel 292C1 on its present tower, and, likewise, KXLS can utilize Channel 260C1 on its present tower. Mr. Tyler is unclear as to the status of KWFX. Attachment D is a copy of a letter dated June 18, 1996, from the Commission to counsel for KWFX that recites that the construction permit (File No. BPH-911220IE) KWFX filed to implement its operation on Channel 261C1 was cancelled on September 2, 1994, and that KWFX has stated that "it 'does not intend to utilize the Channel 261C1 construction permit' and relinquishes and surrenders any right which it or KWFX-FM may have to that construction permit." In light of that statement, it may not be necessary to reimburse KWFX, however, Mr. Tyler will reimburse the licensees of KWFX (if applicable, in light of the foregoing) and KXLS for their reasonable and prudent costs incurred in connection with making the channel changes, under the principles of *FM Table of Allotments (Circleville, Ohio)*, 8 FCC 2d 159 (1967). Mr. Tyler requests that the Commission issue an order to the licensees of KWFX, Woodward,

and KXLS, Alva, Oklahoma, to show cause why their licenses should not be modified to operate on Channels 292C1 and 260C1, respectively. Issuance of such an order is consistent with Commission precedent where the requesting party has stated its willingness to reimburse the licensee of the stations for reasonable costs associated with the proposed channel changes. See, *FM Table of Allotments (Milton, West Virginia, et al.)*, 10 FCC Rcd 9292 (1995); *FM Table of Allotments (Berlin, Wisconsin)*, 10 FCC Rcd 7733 (1995); and *FM Table of Allotments (Camden, Arkansas)*, 10 FCC Rcd 7208 (1995).

10. The Commission's priorities for assigning FM allotments are set out in *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 92 [51 RR 2d 807] (1982). They are: (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). Here, first local service to Tuttle is preferred to what would be a second local service to Tishomingo. Thus, there would be a preferential arrangement of allotments resulting from the allotment of Channel 259C3 to Tuttle.

WHEREFORE, Mr. Tyler respectfully requests the Commission to amend Section 73.202(b) of the Commission's Rules, as follows (changes in **bold**):

Oklahoma

	<u>Present</u>	<u>Proposed</u>
Tishomingo	<b>259C3<sup>2</sup></b>	<b>202A</b>

---

<sup>2</sup> Tishomingo will receive service on Channel 202A upon grant of BPED-970127MD and construction of the new noncommercial FM station.



Tuttle	----	<b>259C3</b>
Woodward	214C3, 221C3	214C3, 221C3
	240A, <b>261C1</b> ,	240A, 266C,
	266C, 272A	272A, <b>292C1</b>
Alva	<b>259C1</b> , 278C1	<b>260C1</b> , 278C1
	289C2	289C2

### **Conclusion**

Mr. Tyler requests the Commission to (a) issue an order requiring the licensee of KWFY, Woodward, Oklahoma, and the licensee of KXLS, Alva, Oklahoma, to show cause why the Commission should not modify the license of KWFY to operate on Channel 292C1, and the license of KXLS, Alva, Oklahoma, to operate on Channel 260C1; (b) allot Channel 259C3 to Tuttle, Oklahoma, and (c) modify the license of KTSH to operate on FM Channel 259C3 at Tuttle, Oklahoma. As stated supra, if the FCC modifies the license of KTSH to operate on Channel 259C3 at Tuttle, Mr. Tyler will timely file an application for minor change construction permit to operate KTSH at Tuttle, and upon grant thereof, Mr. Tyler will construct the new facilities and operate them; and will reimburse the licensees

of KWFY and KXLS for their reasonable costs associated with the channel change.

Respectfully submitted,

**RALPH TYLER**

By:

A handwritten signature in black ink, appearing to read 'Gary S. Smithwick', written over a horizontal line.

Gary S. Smithwick  
His Attorney

**SMITHWICK & BELENDIUK, P.C.**

1990 M Street, N.W.

Suite 510

Washington, D.C. 20036

(202) 785-2800

March 21, 1997

KTSH/PN/PETITION.RM

**ATTACHMENT A**

# **BROMO** **COMMUNICATIONS** Inc.

BROADCAST  
TECHNICAL CONSULTANTS

WILLIAM G. BROWN  
CLIFTON G. MOOR  
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**PETITION FOR RULEMAKING**  
**Re-Assign Channel 259C3**  
**KTSH Radio Station**  
**Tuttle, Oklahoma**  
**March 1997**

**PETITION FOR RULEMAKING  
Re-ASSIGN CHANNEL 259C3**

**KTSH Radio Station**

**Tuttle, Oklahoma**

**March 1997**

This Technical Exhibit supports the Petition for Rulemaking that proposes to re-assign Channel 259C3 from Tishomingo, Oklahoma to Tuttle, Oklahoma and order KTSH to move to the new city of license. This proposal provides the city of Tuttle, Oklahoma with its first local service. Tuttle is an incorporated city with its own government and is located about 25 miles southwest of Oklahoma City. Neither Tuttle nor Grady County is located inside the Oklahoma City Urbanized Area (Exhibit #3). According to the U.S. Census the 1990 population of the city of Tuttle is 2,807 persons. The same census shows Tishomingo with a population of 3,116 persons. Tuttle has schools, police, fire departments, post office and businesses. Additional information on Tuttle can be found elsewhere in this proposal. Tuttle meets the Commission's requirements as a community, thus it is eligible for a FM assignment.

This proposal will not leave Tishomingo without service since South Central Oklahoma Christian Broadcasting, Inc. has applied for Channel 202A to be assigned to Tishomingo (see *BPED 970127MD*). Once this application is granted and Channel 202A begins operation Tishomingo will have continued service.

We propose to utilize an allocation point of North Latitude 35° 17' 33" and West Longitude 97° 42' 58". This site is located inside the city of Tuttle. With a normal Class C3 city grade signal (70 dBu) contour going 22.8 km (14.2 miles), Tuttle will receive a 70 dBu city grade signal over the entire city (see Exhibit #1).

In order to meet all of the spacing provisions of §73.207 two channel changes must be made. We propose to substitute Channel 292C1 at Woodward, Oklahoma for the currently assigned Channel 260C1. This Channel is shown in the FCC's database as reserved open allocation for KWFX. However, further investigation finds KWFX operating on this channel. Channel 292C1 can be used at the KWFX site. With the change at Woodward we propose to

substitute channel 260C1 for Channel 259C1 at Alva, Oklahoma. Channel 259C1 is licensed to KXLS and as with Woodward, Channel 260C1 can be utilized by KXLS on their present site. We show in **Exhibit #2B** that Channel 292C1 can be used by KWFX and in **Exhibit #2C** that Channel 260C1 can be used by KXLS and meet all spacing requirements of §73.207 of the Commission's Rules. From the proposed allocation point and the above mentioned substitutions Channel 259C3 can be assigned and meet all spacing provisions of §73.207 (**see Exhibit #2A**).

#### **Proposed Changes to FM Table of Assignments**

	<u>Present</u>	<u>Proposed</u>
Tishomingo	<u><b>259C3</b></u> , 202A*	202A*
Tuttle	None	<u><b>259C3</b></u>
Woodward	214C3, 221C3, 240A	214C3, 221C3, 240A
	<u><b>261C1</b></u> , 266C, 272A	266C, 272A, <u><b>292C1</b></u>
Alva	<u><b>259C1</b></u> , 278C1, 289C2	<u><b>260C1</b></u> , 278C1, 289C2

\* Channel 202A is an application (BPED 970127MD)

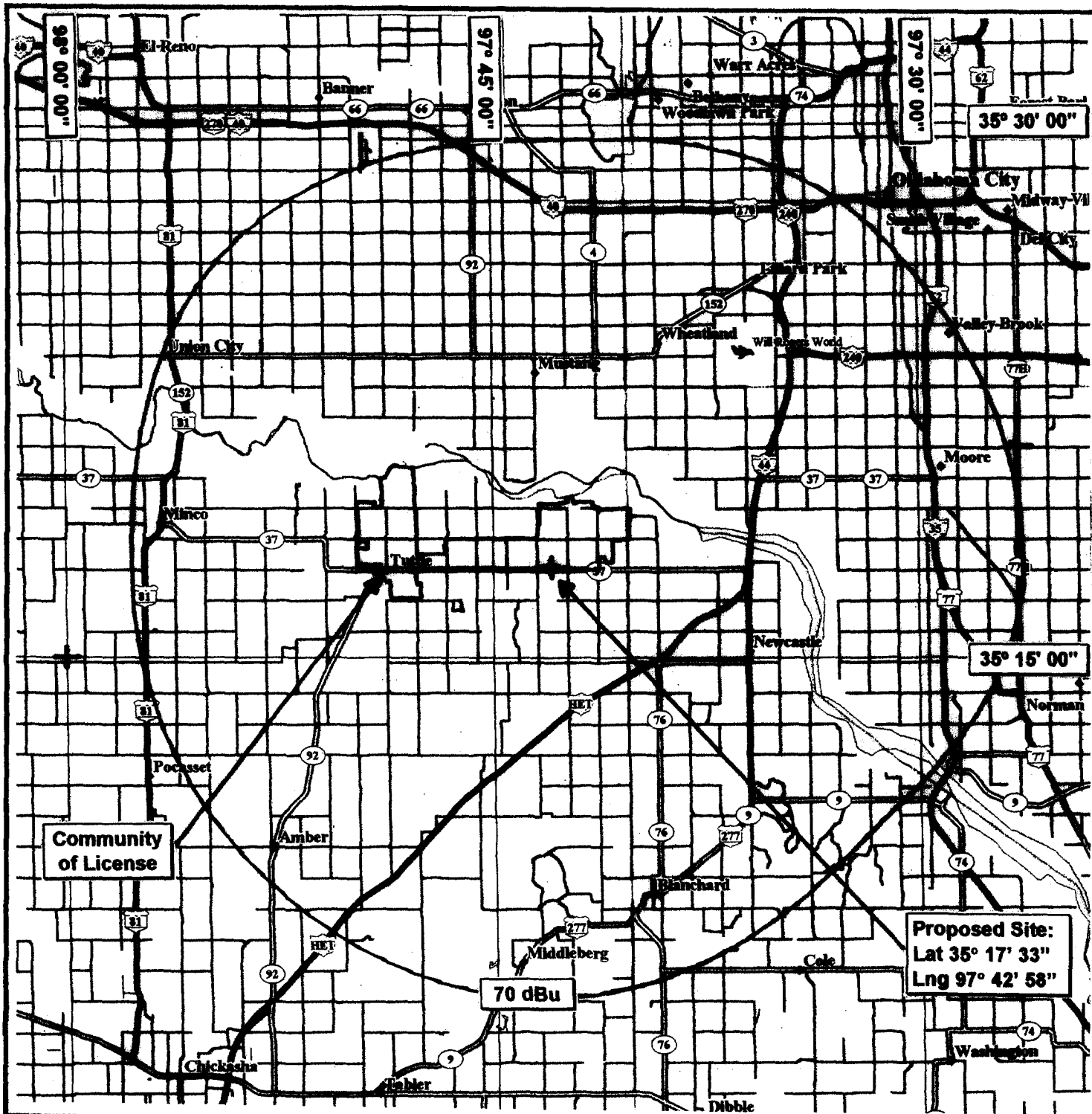
Additionally, the proposed allocation site is shortspaced to both the present KTSH site and the KTSH application site (BPH-970220IA).

As we stated earlier, this proposal gives Tuttle, Oklahoma its first local service. While Tuttle is close (approx. 25 miles) to Oklahoma City, we show in Exhibit #3 that it is not within the Oklahoma City Urbanized area and from the proposed site 23% of the Urbanized Area will receive a 70 dBu or greater signal.

**Bromo Communications, Inc.**

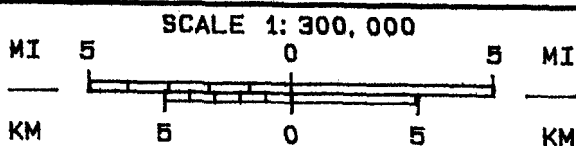


William G. Brown



### City Grade Coverage

Map is State of Oklahoma  
Scale 1:300,000  
©1993 DeLorme Mapping



**EXHIBIT #1**  
**Petition for Rulemaking**  
**Reassign Channel 259C3**  
**KTSH Radio Station**  
Tuttle, Oklahoma  
March 1997

**BROMO** BROADCAST  
COMMUNICATIONS TECHNICAL CONSULTANTS

Allocation Study for Channel 259C3  
Tuttle Oklahoma

REFERENCE  
35 17 33 N  
97 42 58 W

CLASS = C3  
Current Spacings

DISPLAY DATES  
DATA 03-07-97  
SEARCH 03-07-97

----- Channel 259 - 99.7 MHz -----							
Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.			HAAT			
KTSH.A AP	259C3	Tishomingo	OK	134.83	142.3	153.0	-18.17
34 19 46	96 49 02	CN	25.000 kW	100 M			
		Ralph Tyler		BPH970220IA	970228		
KTSH.C CPM	259C3	Tishomingo	OK	148.02	134.2	153.0	-4.98
34 21 34	96 33 34	CN	25.000 kW	100 M			
		Ralph H. Tyler		BMPH960228IC	970226		
KXLS LI	260C1	Alva	OK	152.61	341.5	144.0	8.61
36 35 41	98 15 38	CN	100.000 kW	256 M			
		Chisholm Trail Broadcasting C		BLH810320AE	970218		
KBZQ LI	258C3	Lawton	OK	108.74	224.5	99.0	9.74
34 35 31	98 32 55	CN	16.000 kW	103 M			
		William R. Fritsch, Jr.		BLH951031KB	960419		
KCKI LI	258C1	Henryetta	OK	156.30	66.8	144.0	12.30
35 50 02	96 07 28	CN	100.000 kW	299 M			
		Tulsa Great Empire Broadcasti		BLH860425KD	960820		
KOCC.A AP	205C2	Oklahoma City	OK	41.80	31.4	17.0	24.80
35 36 48	97 28 29	CN	17.000 kW	151 M			
		Oklahoma Christian University		BPED960925MA	970124		
KOCC LI	205C3	Oklahoma City	OK	41.80	31.4	14.0	27.80
35 36 48	97 28 29	CN	4.300 kW	153 M			
		Oklahoma Christian University		BLED910318KG	970131		
KLUR LI	260C1	Wichita Falls	TX	171.82	206.2	144.0	27.82
33 54 04	98 32 21	CN	100.000 kW	253 M			
		Sam F. Beard & Pamela S. Bear		BLH6738	961223		

**\$73.207 Allocation Study**

**EXHIBIT #2A**  
**Petition for Rulemaking**  
**Reassign Channel 259C3**  
**KTSH Radio Station**  
Tuttle, Oklahoma  
March 1997

**BROMO** BROADCAST  
COMMUNICATIONS TECHNICAL CONSULTANTS



Allocation Study for Channel 292C1  
Woodward Oklahoma

REFERENCE  
36 20 40 N  
99 28 00 W

CLASS = C1  
Current Spacings

DISPLAY DATES  
DATA 03-07-97  
SEARCH 03-07-97

----- Channel 292 - 106.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
KTTLC CPM	289C2	Alva	OK	95.50	58.8	16.50
36 47 06	98 33 01	CN	50.000 kW	150 M		
W. H. A. M. for Better Broadc						
AD293 AD	293A	El Reno	OK	153.03	125.5	20.03
35 32 18	98 05 26		0.000 kW	0 M		
Fred R. Morton, Jr.						
Site Restriction 12.5km West						
KCLIFM LI	295C1	Clinton	OK	105.09	155.6	23.09
35 28 53	98 59 14	CN	100.000 kW	87 M		
Custer Broadcasting, Inc.						
KGOU LI	292A	Norman	OK	223.62	121.1	23.62
35 17 22	97 21 30	CN	3.000 kW	91 M		
The University of Oklahoma						
KYQQ LI	293C	Arkansas City	KS	249.78	62.4	40.78
37 21 24	96 57 55	CN	100.000 kW	390 M		
Wichita Great Empire Broadcas						
KQTZ LI	290C	Hobart	OK	164.25	174.5	59.25
34 52 15	99 17 36	CN	100.000 kW	311 M		
Altus Radio, Inc.						
ALOPEN AL	292C2	Wichita Falls	TX	284.51	163.1	60.51
33 53 18	98 34 08	N	0.000 kW	0 M		
87-341						
EFFECTIVE 6-20-88-RESERVED FOR KTLT PER D87-341						

**KWFX Allocation Study\***

\*Operating on Channel 292 at present facilities

**EXHIBIT #2B**  
**Petition for Rulemaking**  
**Reassign Channel 259C3**  
**KTSH Radio Station**  
Tuttle, Oklahoma  
March 1997

**BROMO**  
**COMMUNICATIONS**  
BROADCAST  
TECHNICAL CONSULTANTS

Allocation Study for Channel 260C1  
Alva Oklahoma

REFERENCE  
36 35 41 N  
98 15 38 W

CLASS = C1  
Current Spacings

DISPLAY DATES  
DATA 03-07-97  
SEARCH 03-07-97

----- Channel 260 - 99.9 MHz -----									
Call	Channel	Location	Power	Dist	Azi	FCC	Margin		
N. Lat.	W. Lng.				HAAT				
								notes	
KXLS	LI 259C1	Alva	OK	0.00	0.0	177.0	-177.00	-1-	
36 35 41	98 15 38	CN	100.000 kW		256 M				
		Chisholm Trail Broadcasting C			BLH810320AE	970218			
ALOPEN	AL 261C1	Woodward	OK	111.61	255.9	177.0	-65.39	-2-	
36 20 40	99 28 00	N	0.000 kW		0 M				
	90-286					951208			
KIXR	LI 261A	Ponca City	OK	110.48	78.4	133.0	-22.52	-3-	
36 47 19	97 02 53	CN	3.000 kW		91 M				
		Mur-Thom Broadcasting, Inc.			BLH840814BY	970203			
KYFM.C	CP 260C3	Bartlesville	OK	205.55	78.9	211.0	-5.45	-4-	
36 55 37	95 59 45	CN	14.000 kW		136 M				
		KYFM Radio, Inc.			BPH950113IZ	970203			
KSKG	LI 260C1	Salina	KS	252.48	14.6	245.0	7.48		
38 47 36	97 31 33	CN	100.000 kW		174 M				
		Eagle Radio, Inc.			BLH6653	970228			
KSKG	LI 260C1	Salina	KS	253.31	12.9	245.0	8.31		
38 49 03	97 36 31	CN	0.135 kW		8 M				
		Eagle Radio, Inc.			BLH920608KH	970228			
ALOPEN	AL 261C1	Bartlesville	OK	187.09	79.0	177.0	10.09		
36 53 55	96 12 00	N	0.000 kW		0 M				
	96-80					970203			
KTCM	LI 262C2	Kingman	KS	100.73	4.4	79.0	21.73		
37 29 59	98 10 24	CN	48.000 kW		154 M				
		Jimmy Wayne Lee, Trustee			BLH891010KE	970214			
		Silent Station License Canceled 2-9-97 per Telecom Act 1996							
KATTFM	LI 263C	Oklahoma City	OK	131.65	147.8	105.0	26.65		
35 55 22	97 29 03	CY	100.000 kW		363 M				
		Caribou Communications Co.			BLH841105DA	970226			

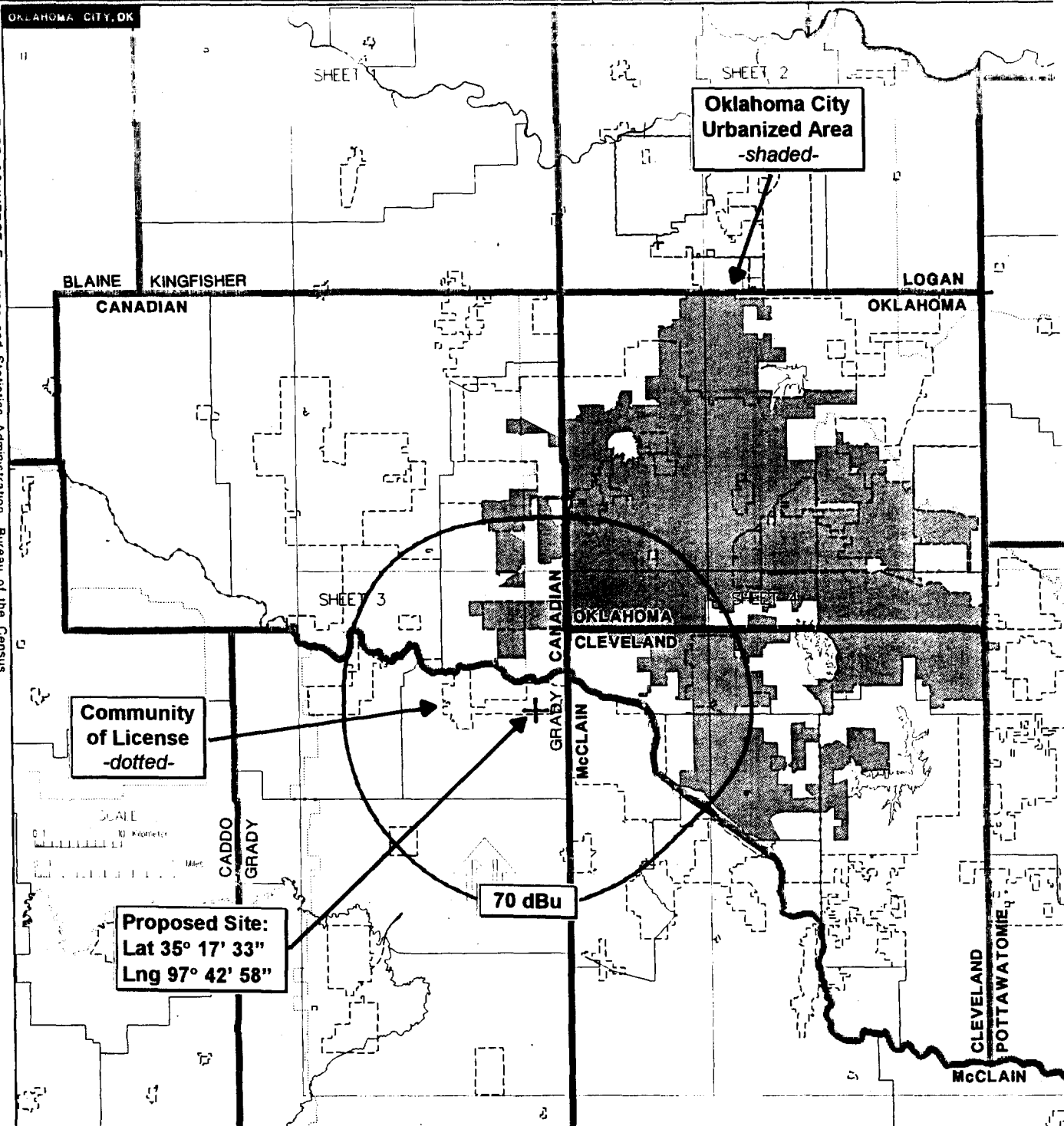
### KXLS Ch 260C1 Allocation Study

- <sup>1</sup>KXLS to Channel 260C1
- <sup>2</sup>ALOPEN (KWFX) to Channel 292C1
- <sup>3</sup>KIXR to Channel 284A
- <sup>4</sup>KYFM to Channel 262C1

**EXHIBIT #2C**  
**Petition for Rulemaking**  
**Reassign Channel 259C3**  
**KTSH Radio Station**  
Tuttle, Oklahoma  
March 1997

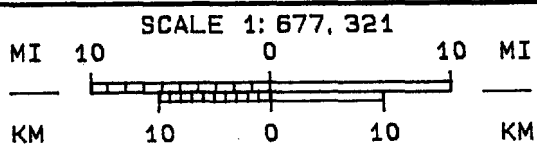
**BROMO**  
**COMMUNICATIONS**

BROADCAST  
TECHNICAL CONSULTANTS



## 70dBu Coverage of Urbanized Area

Map is State of Oklahoma  
Scale 1:677,321  
Bureau of Census  
Economics and Statistics Administration  
Department of Commerce



**EXHIBIT #3**  
**Petition for Rulemaking**  
**Reassign Channel 259C3**  
**KTSH Radio Station**  
Tuttle, Oklahoma  
March 1997

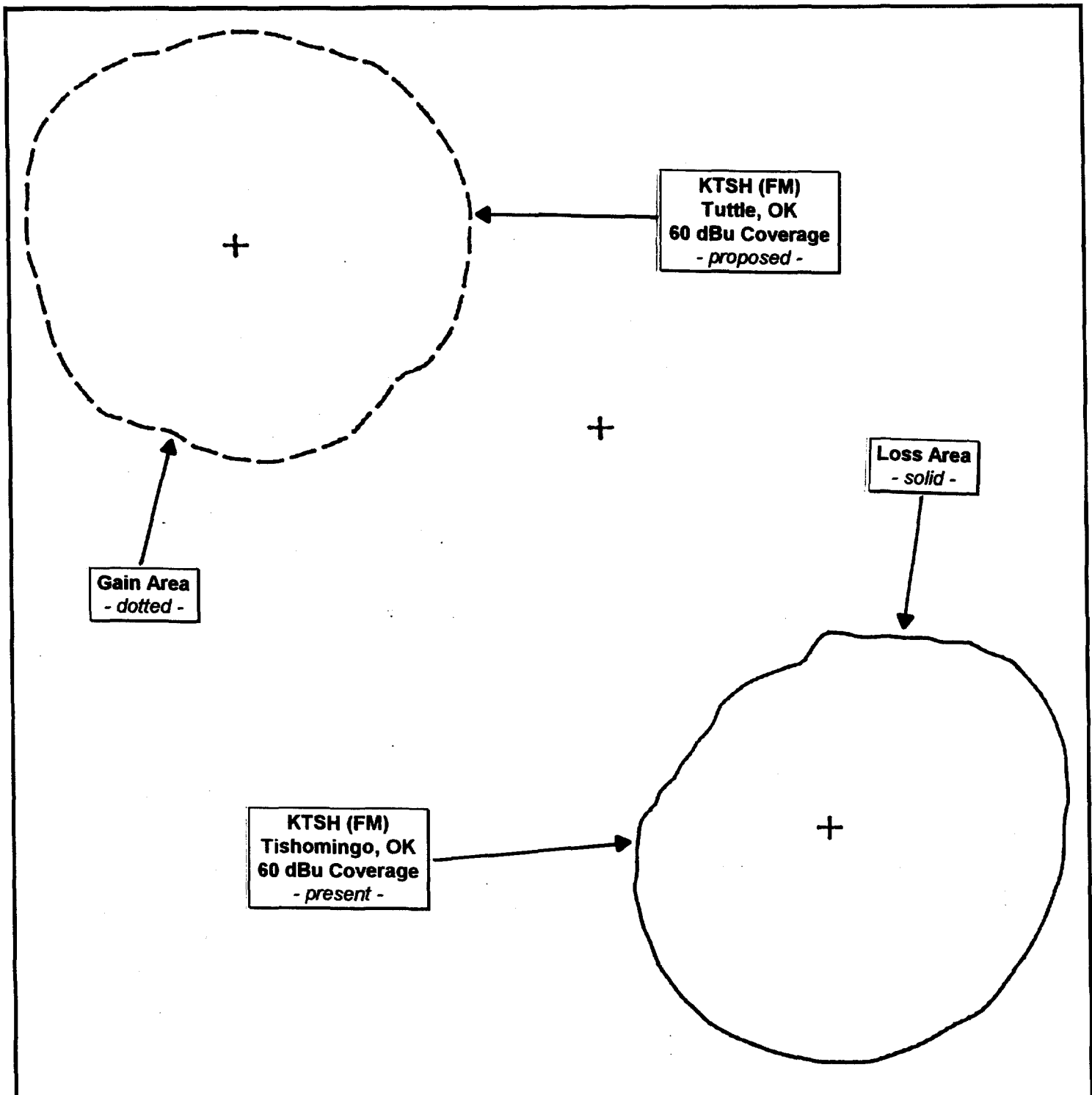
**BROMO**  
**COMMUNICATIONS**  
BROADCAST  
TECHNICAL CONSULTANTS

**PETITION FOR RULEMAKING**  
**Re-Assign Channel 259C3**  
**KTSH Radio Station**  
Tuttle, Oklahoma  
March 1997

**EXHIBIT #4**  
**GAIN/LOSS STUDY**

We have compared the 1.0 mV/m primary contour of KTSH from the proposed site as a maximum Class C3 facility against the present KTSH 1.0 mV/m utilizing their present facilities. *Exhibit #4A* shows the two subject contours. Since the contours do not overlap the entire present 1.0 mV/m service area is loss and the proposed contour is entirely gain area. Utilizing the 1990 U.S. Census we have determined that the present 1.0 mV/m contour serves 36,134 persons and the proposed facilities will serve 767,353 persons. There is also a small increase in area coverage since the present facilities serve 4,511 square km and the proposed facility will cover 4,778 square km.

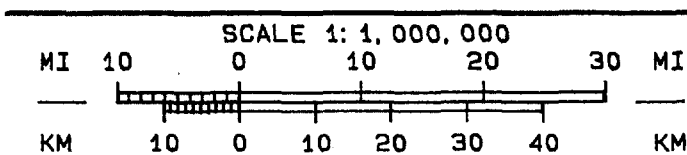
We also show in *Exhibits #4B* and *Exhibit #4C* FM and AM stations that provide primary service (1.0 mV/m for FM and 0.5 mV/m for AM) to the loss area. These studies show that at least five or more stations provide service to the entire coverage area. We have only included licensed facilities with the exception of the application for Channel 202A at Tishomingo. Since it is expected that this station will begin operation before KTSH moves to Tuttle, Oklahoma this station will provide service to the community and should be considered in this study. However, we should mention that even without the Channel 202 application there are five or more services providing service to the loss area.



### Gain/Loss Areas

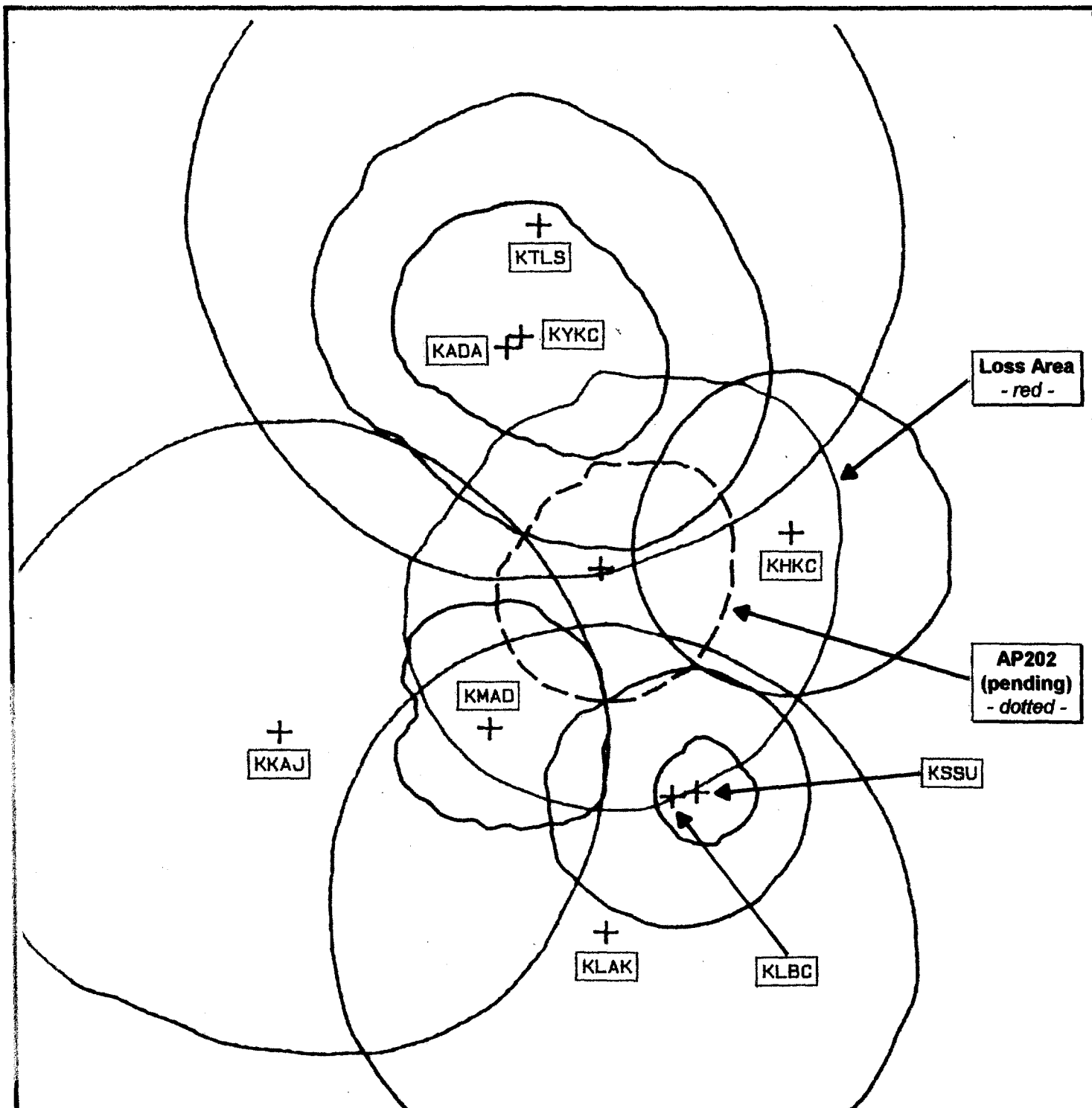
**Present Facilities:** 36,134 persons  
4511.2 sq. km

**Proposed Facilities:** 767,353 persons  
4777.8 sq. km



**EXHIBIT #4A**  
**Petition for Rulemaking**  
**Reassign Channel 259C3**  
**KTSH Radio Station**  
Tuttle, Oklahoma  
March 1997

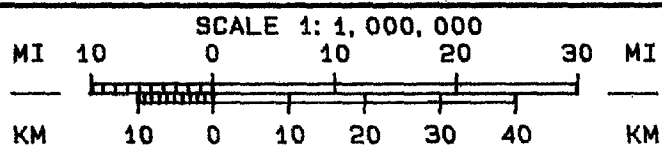
**BROMO** BROADCAST  
COMMUNICATIONS TECHNICAL CONSULTANTS



### FM Stations Within Loss Area

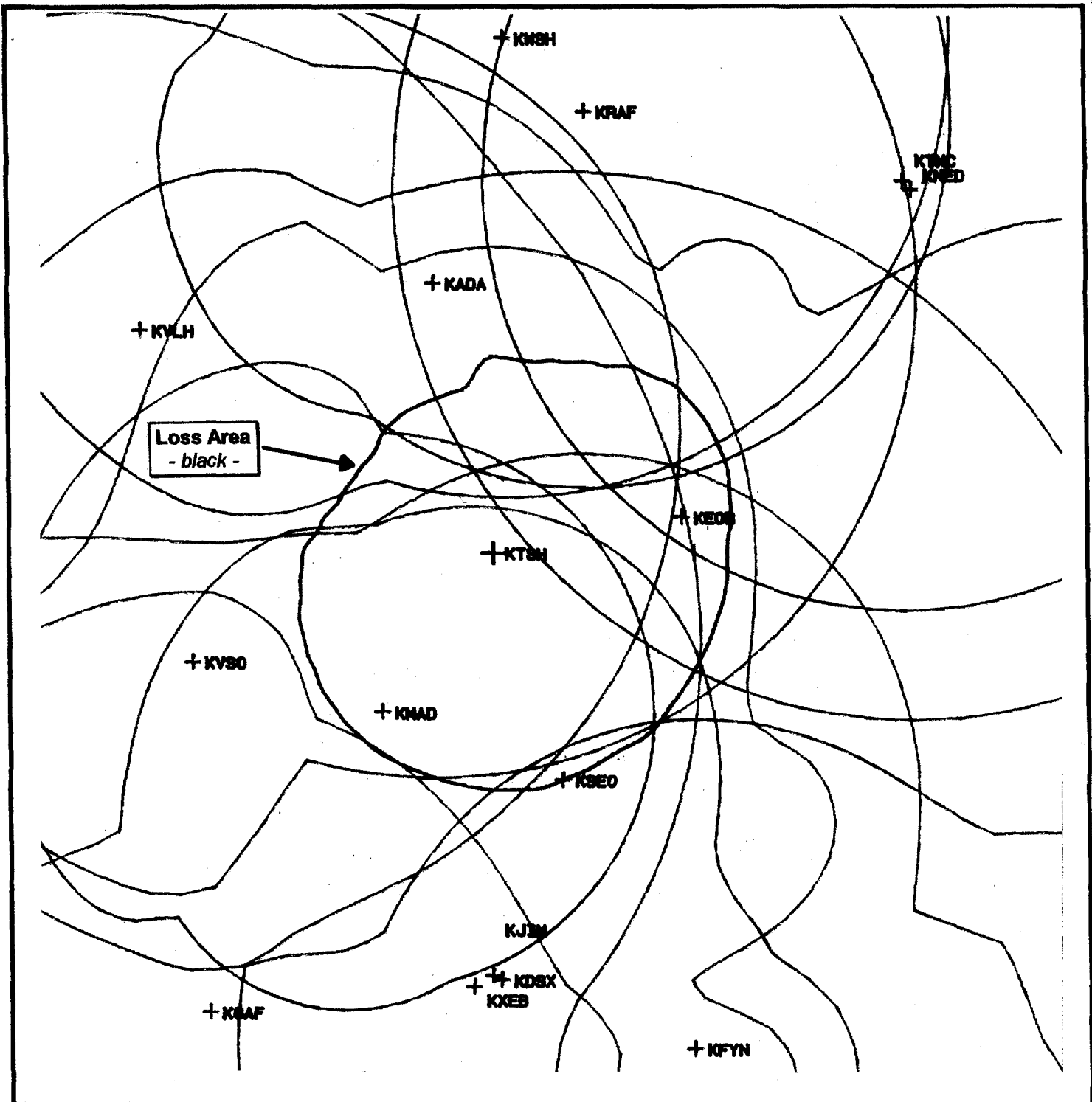
FM Stations: KSSU, KTLS, KKAJ, KADA,  
KLAK, KYKC, KMAD, KHKC,  
KLBC

All FM Contours are 1.0 mV/m



**EXHIBIT #4B**  
**Petition for Rulemaking**  
**Reassign Channel 259C3**  
**KTSH Radio Station**  
 Tuttle, Oklahoma  
 March 1997

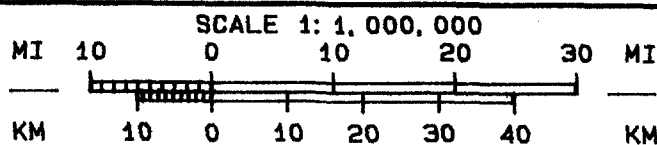
**BROMO** BROADCAST  
 COMMUNICATIONS TECHNICAL CONSULTANTS



### AM Stations Within Loss Area

AM Stations: KSEO, KXEB, KDSX, KEOR, KNED, KADA, KVSQ, KWSH, KRAF, KTMC, KFYN, KVLH, KJIM, KMAD, KGAF

All AM Contours are 0.5 mV/m



**EXHIBIT #4C**  
**Petition for Rulemaking**  
**Reassign Channel 259C3**  
**KTSH Radio Station**  
 Tuttle, Oklahoma  
 March 1997

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**COMMUNICATIONS**

BROADCAST  
 TECHNICAL CONSULTANTS

**ATTACHMENT B**



**Swbyp's**<sup>TM</sup>



**Southwestern Bell**

**Tuttle**

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**December 1994—Keep until December '95**

**Content Listing Inside**

